RECEIVE

JAN - 9 2008 Jan 9, 2008 MICHAEL W. DOBBINS CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MARIAN LAFERRIERE ?	
$(\mathcal{L}(\mathcal{L}), \mathcal{L}(\mathcal{L}))$	L ACTION
PREMIER MANAGMENT SERVICES INC)	08CV0186 JUDGE NORGLE MAG.JUDGE KEYS
(Name of the defendant or defendants)	
COMPLAINT OF EMPLOYMENT	<u>DISCRIMINATION</u>
1. This is an action for employment discrimination,	
2. The plaintiff is MARIAN LAFER	RIERE of the
county of LAKE in the si	tate of 1L
3. The defendant is PREMIER MANAGMEN	
street address is 595 ELM PL.	
(city) HIGHLAND PARK(county) CAKE (state) (Defendant's telephone number) (847 - 432 -	1 <u>L (ZP) 60035</u> 1600
4. The plaintiff sought employment or was employed by	the defendant at (street address)
339 W. BARRY AV.	(city) OHICAGO
(county) COOK (state) L (ZIP code)	60657
5. The plaintiff [check one box]	
(a) was denied employment by the defendant.	
(b) was hired and is still employed by the defe	ndant.

ω
(c) was employed but is no longer employed by the defendant.
6. The defendant discriminated against the plaintiff on or about, or beginning on or about,
(month) <u>SEP</u> , (day) , (year) <u>O</u> ?
7.1 ///
7.1 (Choose paragraph 7.1 or 7.2, do not complete both.)
(a) The defendant is not a federal governmental agency, and the plaintiff [check
one box] has filed a charge or charges against the defendant
asserting the acts of discrimination indicated in this complaint with any of the following
government agencies:
(i) the United States Equal Employment Opportunity Commission, on or about (month) 12 (day) 12 (year) 07.
(ii) the Illinois Department of Human Rights, on or about
(month) (day) (year)
(b) If charges were filed with an agency indicated above, a copy of the charge is
attached. YES. NO, but plaintiff will file a copy of the charge within 14 days.
It is the policy of both the Equal Employment Opportunity Commission and the Illinois
Department of Human Rights to cross-file with the other agency all charges received. The
plaintiff has no reason to believe that this policy was not followed in this case.
7.2 The defendant is a federal governmental agency, and
(a) the plaintiff previously filed a Complaint of Employment Discrimination with the
defendant asserting the acts of discrimination indicated in this court complaint.
Yes (month) (day) (year)
No, did not file Complaint of Employment Discrimination
2. The plaintiff received a Final Agency Decision on (month)
(day)(year)
c. Attached is a copy of the
a. Complaint of Employment Discrimination,

	YES NO, but a copy will be filed within 14 days.
	(ii) Final Agency Decision
	YES NO, but a copy will be filed within 14 days.
8.	(Complete paragraph 8 only if defendant is not a federal governmental agency.)
	(a) the United States Equal Employment Opportunity Commission has not issued a
	Notice of Right to Sue.
	(b) the United States Equal Employment Opportunity Commission has issued a
	Notice of Right to Sue, which was received by the plaintiff on (month) 01 (day) 04 (year) 08 a copy of which Notice is attached to this complaint.
9.	The defendant discriminated against the plaintiff because of the plaintiff's [check only those that apply]:
	(a) Age (Age Discrimination Employment Act).
	(b) Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
	(c) Disability (Americans with Disabilities Act or Rehabilitation Act)
	(d) National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
	(e) Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
	(f) Religion (Title VII of the Civil Rights Act of 1964)
	(g) Sex (Title VII of the Civil Rights Act of 1964)
10.	If the defendant is a state, county, municipal (city, town or village) or other local
	governmental agency, plaintiff further alleges discrimination on the basis of race, color,
	or national origin (42 U.S.C. § 1983).
l 1.	Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII
	claims by 28 U.S.C.§1331, 28 U.S.C.§1343(a)(3), and 42 U.S.C.§2000e-5(f)(3); for

12.

13.

42 U.S.C.§1981 and §1983 by 42 U.S.C.§1988; for the A.D.E.A. by 42 U.S.C.§12117; for the Rehabilitation Act, 29 U.S.C. § 791. The defendant [check only those that apply] failed to hire the plaintiff. terminated the plaintiff's employment. failed to promote the plaintiff. failed to reasonably accommodate the plaintiff's religion. (e) If failed to reasonably accommodate the plaintiff's disabilities. $\mathbf{m}V$ failed to stop harassment; retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above; other (specify) The facts supporting the plaintiff's claim of discrimination are as follows: DISABILITIES Philipin G In

14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

The plaintiff demands that the case be tried by a jury. WES 15.

16. THER	REFORE, the plai only those that ap	ntiff asks that t ply]	he court grai	nt the follo	owing relief to	the plaintiff
(a)	Direct the defer	ndant to hire the	plaintiff.			
(b)	Direct the defer	ndant to re-emp	loy the plain	tiff.		
(c)	Direct the defer	dant to promot	te the plainti	ff.		
(q)	Direct the defer	idant to reasons	ably accomm	odate the	plaintiff's relig	gion.
(e)	Direct the defer	idant to reasons	ibly accomm	odate the	plaintiff's disa	bilities.
(f)	Direct the defer	dant to (specif	y):			· · · · · · · · · · · · · · · · · · ·
	·	··· ···		<u> </u>	·	
<u> </u>	·					
	· · · · · · · · · · · · · · · · · · ·			·	· · · · · · · · · · · · · · · · · · ·	
(g) [] /	If available, gra liquidated/doub prejudgment int attorney fees an	le damages, fro erest, post-judg	nt pay, comp ment interes	ensatory (lamages, punit	ive damages.
(h) 🚺	Grant such othe	r relief as the C	ourt may fin	d appropri	ate.	
(Plaintiff's	s signature)	UBin.	<u></u>	'		
(Plaintiff's			RRIE F	3Ē_		
(Plaintiff's	street address)		٠			
944	W. MO					
(City)	(2	State)	(ZIP)			
Plaintiff's tele	ephone number)	<u></u>		- 	_	
			Σ	Oate:	-	

List WITNESSES

- 1. NATASHA FENDERSON
- 2. LINDA HARRIS
- 3. ALEXIS MARTIN
- 4. HUGO CABALLERO
- 5 PAULA JUNES
- 6. GENEWA CORIROSSI
- 7. GREG MINER
- 8. BLAKE BERISH
- 9. WIESLAW (WESLY)
- 10. EDGAR PALMA
- 11. M. SMITH

Date issued: April 5, 2006

Document 1

Filed 01/09/2008

Page 7 of 16

State of Illinois Department of Human Services

MEDICAL EVALUATION - Physician's Report

IDENTIFYING INFORMATION LOCAL OFFICE - PLEASE COMPLETE THE FOLLOWING SECTION.

(1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	
Case Number: 03-204	Case Name: LAFERRIERE, MARIAN
Cesse Address: 944 W MONTROSE AVE	CHICAGO, IL 60613-1463
Patient Name: LAFERRIERE, MARIAN	SSN (required):
Date of Birth: 09-12-1968	Caseload Number: U55
Application Date: 04-05-2006	Doctor's Name: DR Alaward Javels
Doctor's Address: COOPA CUUNIY Stroggy	Doctor's Phone: (312) 864 - 7250
Harrison 60612	
MEDICAL PROVIDER - PLEASE CO We appreciate your cooperation in examining this patient, to determine eligibility for assistance or employability statu	ASSESSMENT OMPLETE THE FOLLOWING SECTIONS A detailed report of the information as requested is necessary us. Existing medical records may be provided to supplement or arson's current condition. Return the completed form to:
U55 Family Community Resource Center Uptown 2112 West Lawrence Ave. Chicago IL 60625-1498	
Date last examined: $4/5/2006$ Date first seen: Number of hospitalizations in the last 12 months:	SRealing Approximate dates: 2/2(106 Emerge
Chief complaints of patient with dates of onset:	usea, Nomi Mae, Fever, Jul, Unable to think and polydepsia (skin, relection)
Significant lab tests (show dates and results):	
iematocrit: <u> </u>	ANA:
Creatinine: 0.9 Billrubin:	Other: BUDDO SUADI
,	Page 2 of 5 2/21/06 236 ER /

Patient Education Materials Follows

Tojury & Illness

DIABETES

Diabetes is a chronic health condition where the body is unable to produce enough insulin to control the level of glucose (sugar) in the blood. This results in high blood sugar. If not controlled, diabetes can cause long-term problems involving the kidney, heart, eyes, circulation and nerves.

Your actual blood sugar level is a result of the balance between several factors. These include what kind of food and how much you eat, how much exercise you get and the amount of insulin available in your body. Stresses to the body such as infections can cause high blood sugar. Taking too much of your diabetes medicine or not eating regular meals can lead to dangerously low blood sugar.

HOME CARE:

- 1) Follow your prescribed diabetic diet
- 2) Monitor blood sugars as advised
- 3) Take insulin or oral diabetic medicine exactly as ordered
- 4), Try to achieve your ideal weight
- 5) Avoid tobacco smoking, which worsens the effect of diabetes on your circulation
- 6) Exercise regularly
- 7) Pay close attention to foot care to avoid infections there
- 5) Wear a Medic-Alert bracelet
- 9) If you feel like your blood sugar may be too high, measure it by a blood or urine test. If it is above your usual range, use the "sliding scale" Regular insulin dose your doctor gave you to correct this. If no "sliding scale" orders were given, contact your doctor for further advice.
- 10) If you are unable to eat your normal amount at each meal due to illness or vomiting, you MUST reduce your insulin dose. Contact your doctor to ask for a temporary adjustment of your insulin dose. If you cannot eat, and there is a delay in reaching your doctor, reduce your daily insulin dose to ONE-HALF (½) of what you usually take. Monitor your blood sugar every 4-6 hours, until you are able to begin eating again normally.

RETURN PROMPTLY or contact your doctor if any of the following occur:

- HIGH BLOOD SUGAR: frequent urination, dizziness, thirst, headache, nausea or vomiting, abdominal pain, drowsiness or loss of consciousness
- LOW BLOOD SUGAR: fatigue, headache, shakes, excess sweating, hunger, anxiety, restlessness, reduced vision, drowsiness, weakness, confusion or loss of consciousness

DIABETES WITH HIGH BLOOD SUGAR

You have been treated for high blood sugar (hyperglycemia). This may be the result of an infection or other illness, not following your diet (eating too many sweets or starches), not taking enough insulin or other factors.

HOME CARE:

- 1) High blood sugar may cause symptoms that you can learn to recognize, such as those listed below.
- 2) If you feel like your blood sugar may be too high, measure it by a blood or urine test. If it is above your usual range, use the "sliding scale" Regular insulin dose your doctor gave you to correct this. If no "sliding scale" orders were given, contact your doctor for further advice.
- 3) If your blood sugar is over 300, and you can't reach your doctor, call or return to this facility.

FOLLOW UP: Monitor and write down your blood sugars at least twice a day (before breakfast and before dinner) during the next 3-5 days. See your doctor during the next week to review these records

Name: MARIAN LAFERRIERE 21 - Feb - 2006 17:21 Stroger

Page No: 2 of 5

FANTUS HEALTH CENTER RETURN TO WORK/SCHOOL YERIFICATION .

Patient Name	LAFERRIERE	MARIAN	DATE: _	9/2/03
Urst Number	2199101		· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
TO WHOM IT MA	Y CONCEPN:			
The above named	person:			
D was treated a	st Funtue Health Center	on the following date(s):_	Sept 2,	2003
🗖was it and u	nable to work from:	<u> </u>	0	
🔾 etates he/she	was III and unable to w	ork from:	thru	
C may return to	work/school on:		 	
Commercial contracts of the contract of the co	work on: Sept 3rd	(12003 with restriction	re es follows:	void exposure
	in solvents	and mechan	ical Lubri	cants
may resume	school on	with the folio	wing restrictions:	
				,
DIAGNOSIS	Ruse out	Allengi - Skin	reaction	vensus
	porphi	a cutoming	Tourda	
Physician Signature	Ahma	d Jajely D	<u> </u>	
Print Name	Ahmad To	ejela p	eger No <u>(3/2) 8</u>	39-2462

CONFIDENTIAL

707194101 Externiere 9/12/1468

AND THE ENGLISHED OF

RARIAU

Ħ

60830

F-276

MID-AMERICA BUILDING MAINTENANCE CO. OVERNIGHT SHIFT SECURITY/MAINTENANCE: 339 BARRY HOMEOWNERS ASSOCIATION MAY 4, 2007

I. AREAS TO BE SERVICED

- a. Front Desk Doorman
- b. Entranceway & Lobby Areas
- c. Common Area Hallways/Chute Rooms
- d. Bathroom
- e. Elevators
- f. Stairwells
- g. Lower Level Hallway
- h. Garage
- i. Laundry Room
- j. Resident Storage Areas
- k. Exterior Services

II. SERVICES TO BE PROVIDED (Sunday-Thursday 11:00pm-7:00am)

- a. Front Desk Doorman- 11:00pm-1:00am & 5:00am-7:00am
 - i. Maintain secure entranceway and assist residents
- b. Entranceway/ Lobby Areas
 - i. Clean glass revolving door and side glass (interior and exterior)
 - ii. Sweep and damp mop flooring
 - iii. Vacuum runoff matt
 - iv. Spot clean/wipe glass table tops and side tables
 - v. Dust window ledges and baseboard heaters
 - vi. Replace light bulbs (as needed)
 - vii. Dust clean lighting fixture
 - viii. Wipe clean security desk area
 - ix. Check mail room for debris and empty garbage
 - x. Wipe clean stainless steel entrance panel
- c. Common Area Hallways
 - i. Replace light bulbs (as needed)
 - ii. Remove any garbage from all chute rooms, including bottles, cans and cardboard

MABM Maintenance Proposal: 339 BARRY HOME OWNERS ASSOCIATION

- d. Lower Level Bathroom (as needed)
 - i. Damp mop floor
 - ii. Disinfect clean toilet, sink and bright work
 - iii. Spot clean mirror

e. Elevators

- i. Vacuum carpet-spot clean (as needed)
- ii. Wipe clean stainless steel siding and paneling, including around pushbuttons
- iii. High dust corners and edges (as needed)
- iv. Replace light bulbs (as needed)
- v. Vacuum & polish door tracks (as needed)

f. Stairwells

- i. Sweep and damp mop stairs and landings(as needed)
- ii. Check for debris
- iii. Dust corners and edges (as needed)
- iv. Replace light bulbs (as needed)
- v. Spot clean any wall smudges (if applicable)

g. Lower Level Hallway

- i. Sweep/damp mop vinyl tile (as needed)
- h. Garage (2 levels)
 - i. Police entire interior parking area for debris
 - ii. Empty trash containers (replace liners)
 - iii. Apply oil dry to any automotive leaks (as needed)
 - iv. Broom sweep corners/edges and open areas for any buildup
 - v. Check light lenses for bugs
 - vi. Dust overhead pipes(as needed)

i. Laundry Room

- i. Sweep/damp mop vinyl tile floor
- ii. Empty garbage, replace liner
- iii. Wipe clean slop sink
- iv. Wipe clean exterior of washers & dryers
- v. Be sure area behind machines are free of any buildup
- vi. Vacuum carpeting
- vii. Dust horizontal surfaces

i. Resident Storage Areas(basement level)

i. Sweep and damp mop flooring (as needed)

MABM Maintenance Proposal: 339 BARRY HOME OWNERS ASSOCIATION

k. Exterior Services

- i. Front entrance and building perimeter remove garbage, including cigarette butts, news papers, cans etc. (special attention to planted areas)
- ii. Keep alleyway, garage entrance and around dumpster free of any debris
- iii. Remove snow around perimeter of building, including lobby entranceway, alley and garage entrance

III. ADDITIONAL NOTES

- a. MABM will supply all necessary equipment to complete the general cleaning responsibilities
- b. Cleaning solution, paper products, light bulbs, can liners, oil dry product and 1 x uniform costs will be an additional charge
- c. Work will be performed Sunday thru Thursday 11:00pm 7:00am
- d. All services b. thru k. will be performed between 1:00am-5:00am
- e. MABM will notify management of property maintenance issues

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE	OF RIGHT TO	SUE (ISSUED	ON REQUEST)

	HOIG	E OF KIGHT TO SUE (1880	JED OI	Y (YEWOED)
944 V	an Laferriere V. Montrose Ave. ago, IL 60613		From:	Chicago District Office 500 West Madison St Suite 2800 Chicago, IL 60661
ČER ⁻	TIFIED MAIL 7001 0320 0005 98	32 4372		Cincago, ic 6000
	On behalf of person(s) aggrieved CONFIDENTIAL (29 CFR §1601.)			
EEOC Char	ge No.	EEOC Representative	,	Telephone No.
		Zelma Gonzalez,		
440-2008	-01268	Investigator Support Ass		(312) 886-4821
Notice to t	HE PERSON AGGRIEVED:	(S	iee also	the additional information enclosed with this form.)
under Title ' the ADA mi	VII and/or the ADA based on the ust be filed in a federal or stat	above-numbered charge. It has to	een issu r recelp	t (ADA): This is your Notice of Right to Sue, issued used at your request. Your lawsuit under Title VII or of this notice; or your right to sue based on this .)
	More than 180 days have pass	sed since the filing of this charge.		
X		sed since the filing of this charge, strative processing within 180 days		ve determined that it is unlikely that the EEOC will e filing of this charge.
X	The EEOC is terminating its pr	rocessing of this charge.		
	The EEOC will continue to pro	cess this charge.		•
Age Discrit 90 days afte your case:	er you receive notice that we have	e completed action on the charge	. In this	ny time from 60 days after the charge was filed until regard, the paragraph marked below applies to
	The EEOC is closing your cas 90 DAYS of your receipt of t	e. Therefore, your lawsuit under the his Notice. Otherwise, your right t	he ADEA o sue ba	A must be filed in federal or state court <u>WITHIN</u> ased on the above-numbered charge will be lost.
	The EEOC is continuing its ha you may file suit in federal or s	andling of your ADEA case. Howe state court under the ADEA at this t	ver, if 6	0 days have passed since the filing of the charge,
in federal or	state court within 2 years (3 yea	right to sue under the EPA (filing a ers for willful violations) of the allego years (3 years) before you file su	ed EPA	charge is not required.) EPA suits must be brought underpayment. This means that backpay due for not be collectible.
If you file su	it, based on this charge, please se	end a copy of your court complaint to	o this off	ice.
		On behalf of	the Con	nmission
.	4-3	Jan P.	lu	(2-31-07)
Enclosures	6(S)	John P. Ro District Dire		(Date Mailed)

cc:

'22**0C** Form 161-B (3/98

PREMIER MANAGEMENT SERVICES

-| EEC. P--- 16149 aga

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

	No ⁻	TICE OF RIGHT TO SUE (1)	SSUED O	N REQUEST)	
944	rian Laferriere 1 W. Montrose Ave. icago, IL 60613		From	500 West Madison St Suite 2000	e
CE	RTIFIED MAIL 7099 3400 001	4 4054 1207		Chicago, E. 60661	
	On behalf of person(s) aggrie CONFIDENTIAL (29 CFR §1:				
EECC CH	arge No	EEOC Representative			Telephone No.
		Zelma Gonzalez,			
<u>440-260</u>	3-01155	Investigator Support	Asst		(312) 886-4821
	THE PERSON AGGRIEVED:		(See also	the additional information	n enclosed with this form.)
under Title the ADA r	e VII and/or the ADA based on must be filed in a federal or Il be lost. (The time limit for filin	4 and/or the Americans with Disa the above-numbered charge. It has state court <u>WITHIN 90 DAYS</u> of yong suit based on a state claim may	as been issu your receip be different.	ued at your request. You tof this notice; or your	ır lawsuit under Title VII or
		passed since the filing of this charg	je.		
X		passed since the filing of this char ministrative processing within 180 o			nlikely that the EEOC will
X	The EEOC is terminating i	ts processing of this charge.			
	The EEOC will continue to	process this charge.			•
	fier you receive notice that we	et (ADEA): You may sue under the have completed action on the cha			
		case. Therefore, your lawsult und of this Notice. Otherwise, your rig			
		s handling of your ADEA case. He or state court under the ADEA at the) days have passed sinc	e the filing of the charge,
in federal a	or state court within 2 years (3	the right to sue under the EPA (filir years for willful violations) of the ai n 2 years (3 years) before you file	leged EPA	underpayment. This mea	
lf yo⊔ file s	uit, based on this charge, pleas	e send a copy of your court complai	nt to this offi	ce.	
		On behal	f of the Com	mission	
Enclosure	∍s(s)	John P. District D		-cm _	(Date Mailed)

CC:

MID-AMERICA BUILDING MAINTENANCE CO

CHARGE OF DISCRIMINATION	Charge	Presented To:	Agency(ies) Charge No(s):
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.	200 07	FEPA	
	X	EEOC	440-2008-01155
Illinois Department (Of Human Rig	ghts	and EEOC
State or local Ag	ency, if any	Home Phone (Incl. Area	Code Date of Birth
Mr. Marian Laferriere		(773) 698-133	· · · · · · · · · · · · · · · · · · ·
	and ZIP Code		
944 W. Montrose Ave., Chicago, IL 60613			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeshi Discriminated Against Me or Others. (If more than two, list under PARTICULARS		ate or Local Government	Agency That I Selieve
Name		No. Employees, Members	Phone No. (Include Area Code)
MID-AMERICA BUILDING MAINTENANCE CO		15 - 100	¹ (847) 441-5745
Street Address City, State 5 550 Frontage Road, Suite 283, Northfield, IL 60093	and ZIP Code		
Name		No. Employees, Members	Phone No. (Include Ares Code)
	TIP A		
Street Address City, State :	and ZIP Code		•
DISCRIMINATION BASED ON (Check appropriate box(es).)			MINATION TOOK PLACE
RACE COLOR SEX RELIGION	NATIONAL ORIGI	Eartiest N 10-01-20	
RETALIATION AGE X DISABILITY OT	⊒ ΓHER (Specify below.		
			CONTINUING ACTION
THE PARTICULARS ARE (If additional paper is needed, attach extre sheet(s)):			•
I began employment with Respondent as a Day Porter my disability. During my employment, Respondent de Subsequently, I was subjected to harassment and dis- I believe that I have been discriminated against becau-	enied my requ charged.	uest for an accom	nmodation.
with Disabilities Act of 1990.			
	1(3) - 3	man gang memerikan gapatan dalam dalam kelalam dalam d	
		DEC 1 2 2007	•
	4-1	elos e ast so real and	z (312)
	(ii	HOAGO PETALE	UTU
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY - When	necessary for State and Loca	nl Agency Requirements
I declare under penalty of perjury that the above is true and correct.		nowledge, information an	re charge and that it is true to d belief.
Dec 12, 2007 UBus	SUBSCRIBED AN (month, day, year)	D SWORN TO BEFORE ME	THIS DATE
Date Charding Party Signature	ł		